

# INSTRUCTIONS FOR PREPARING A TITLE V APPLICATION (7-18-95)

## LIST OF APPLICATION AND REPORT FORMS:

APPLICATION FORM TITLE	FORM NUMBER
! STATIONARY SOURCE SUMMARY	< FORM XXX-A1, XXX-A2
! TOTAL STATIONARY SOURCE EMISSIONS	< FORM XXX-B
! COMBUSTION EMISSION UNIT	< FORM XXX-C1, XXX-C2
! COATING / SOLVENT EMISSION UNIT	< FORM XXX-D1, XXX-D2
! ORGANIC LIQUID STORAGE UNIT	< FORM XXX-E1, XXX-E2
! GENERAL EMISSION UNIT	< FORM XXX-F1, XXX-F2
! EMISSION CONTROL UNIT	< FORM XXX-G1, XXX-G2
! EXEMPT EQUIPMENT	< FORM XXX-H
! COMPLIANCE PLAN	< FORM XXX-I1, XXX-I2
! COMPLIANCE PLAN CERTIFICATION	< FORM XXX-J1, XXX-J2
! CERTIFICATION REPORT	< FORM XXX-K1, XXX-K2
! DEVIATION REPORT	< FORM XXX-L
! CERTIFICATION STATEMENT	< FORM XXX-M

## ATTACHMENTS TO APPLICATION PACKAGE:

ATTACHMENT	TITLE
! ATTACHMENT A	< LIST OF AIR POLLUTANTS
! ATTACHMENT B	< DEFINITION OF RESPONSIBLE OFFICIAL
! ATTACHMENT C	< LIST OF ACTIVITIES THAT MAY BE TREATED AS "TRIVIAL"

## INTRODUCTION

- ! These instructions are intended to cover certain questions contained in the application forms that need additional clarification.
- ! The applicant needs to provide sufficient information in an application for a Title V permit such that the applicability of federal air program requirements ("applicable federal requirements" as defined in the District's Title V rule) can be determined and these requirements can be implemented and enforced. The applicant shall provide this information in the District's standard application forms for a Title V permit and other necessary information attached to the application, as described below.

## **INSTRUCTIONS WHICH APPLY TO ALL FORMS**

- ! Where sufficient space is not available in the application forms, attach additional information.
- ! Some forms, particularly the Compliance Plan and Compliance Plan Certification may require the use of multiple copies of that form.
- ! Acid rain sources (see 40 CFR Part 72.6 for applicability criteria) must complete and submit EPA-approved Acid Rain permitting forms as part of the Title V application. These forms are available from the District.
- ! As discussed below, the applicant can provide a cross-reference of existing information, such as permit conditions or equipment descriptions from current permits or enter the information directly into these application forms. Except for equipment descriptions, a cross-reference should be placed on the applicable form. For example, a cross-reference of the work practice requirements identified in current permits is: work practice requirements: conditions # 22 and 23 from District permit to operate (PTO) 86-35 and conditions #1 through 8 from District PTO 93-66. Equipment descriptions in permits, as discussed below, can be provided as a cross-reference in the applicable equipment form or summarized in a separate attachment.
- ! As part of this application, the source can request that terms in permits be revised, deleted or designated as being enforceable only by the District. The applicant need not certify compliance with these permit terms until the District acts upon this request. Should the District deny the request or a portion of the request, the applicant will need to amend the application to indicate the compliance status with these terms.
- ! Some applicable federal requirements may not be addressed by the existing permits. In this case, the necessary information must be provided on the application forms.
- ! The District may request additional information, after the application is deemed complete, for the purposes of developing the Title V permit and to determine permit fees.
- ! Any applicant who fails to submit any relevant facts or who has submitted incorrect information in an application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to the release of a draft permit.

## **SPECIFIC FORM INSTRUCTIONS:**

### **Stationary Source Summary Form (Form XXX-A1 & A2)**

- C 7. Source located within: If the facility is within 50 miles of a bordering state line or a Native American Nation, mark "Yes." A "Yes" response will require the District to: 1) notify the neighboring state and/or Native American Nation with status as an affected state when this application is considered complete, and 2) provide the affected states opportunity to comment on the District's proposed decision regarding this application. Consult with the District to determine if any Native American Nation in the District has been granted status as an affected state. Do not mark "Yes" if a Native American Nation has not been granted

status as an affected state, instead mark the response "Not Applicable."

- C 11. Responsible Official: The applicant should review the definition of Responsible Official, as defined in Attachment B.
- C 15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds: Attachment A contains the Section 112(r) list. Consult this list to determine if the facility uses or stores any threshold quantities of Section 112(r) substances in its operation. If it does, then mark the "Yes" response.
- C 16. Is a Federal Risk Management Plan Required: If the Federal Risk Management regulation has not been finalized at the time the application is expected to be submitted to the District, then mark the response "Not Applicable."

#### **Total Stationary Source Emissions Form (Form XXX-B)**

- C For initial applications, the facility's emissions should be entered in the "EMISSIONS" column. Emission estimates should be based upon **maximum potential to emit**, unless limited by a federally-enforceable permit condition. Not all conditions on PTO issued by the District are considered federally enforceable--in the event of any questions, consult the District.
- C The "PRE-MODIFICATION EMISSIONS" and "EMISSION CHANGE" columns are to be used for permit modifications that involve emission changes.
- C The applicant shall supply annual emission estimates for the following: 1) all air pollutants (See Attachment A) which the source emits in excess of the major source thresholds specified in the District's Title V rule, and 2) those air pollutants regulated by a provision of an applicable federal requirement applicable to the source. For example, emission estimates should be provided for all air pollutants with emission limits in a federally-enforceable permit. Unless emitted in excess of major source thresholds, emissions estimates are not required for those pollutants listed only as Section 112 (r) substances.
- C Additional emission estimates may be required for plantwide emission limits or if the source is avoiding an applicable federal requirement.
- C Except in the circumstances indicated above, other regulated air pollutants that are emitted by the source shall be identified, but no emission estimates are required for these pollutants. Consult Attachment A to identify which pollutants are considered regulated. The District may request the applicant to quantify emissions for some of these pollutants.
- C Similar emissions information should be provided for **each** alternative operating scenario that is proposed.
- C Description of operating scenario: Indicate if the emission estimates are for the main or typical mode of operation of the source or if the estimates are for an alternative operating scenario. Coordinate the description on this form with any list of alternative operating scenarios provided as an attachment to this application.

#### **Emission Unit Forms (Forms XXX-C through G)**

- C Equipment descriptions are to be provided in the application sufficient to determine the applicability of applicable federal requirements. The applicant can provide these descriptions for each piece of equipment in the equipment specific forms or provide a cross-reference to the descriptions contained in PTOs. If the applicant chooses to provide a cross-reference to existing permits, the application should contain an attachment which lists the PTOs and indicates the major equipment described in the permit. If the permits do not provide the necessary description, then these descriptions need to be provided in the equipment specific forms or in District authority to construct application forms.
- C Equipment descriptions should be provided for all equipment affected by an applicable federal requirement, except for those pieces of equipment that are affected by only generic requirements that apply to all emission units (e.g., a SIP-approved opacity rule). Additionally, equipment descriptions should be provided for equipment not currently subject to any applicable federal requirements, but which could be subject to one in the future (e.g., a Maximum Achievable Control Technology (MACT) requirement).
- C Typically, the description of primary equipment (such as a boiler or storage tank), should include, at a minimum, a basic description of equipment, equipment make and model, maximum design process rate or throughput and, if applicable, any associated pollution control equipment. Descriptions for pollution control equipment should also be provided. Solvent use should be described in terms of the chemical makeup of the solvent and the annual usage. The applicant should consult the applicable federal requirement to determine the necessary amount of description.
- C If an applicable federal requirement applicability is based upon the affected source's emissions or emission rate, the applicant should provide emission estimates for that unit in the appropriate emission unit form. Estimates should be consistent with the criteria specified in the applicable federal requirement.

#### **Exempt Equipment Form (Form XXX-H)**

- C **Form XXX-H**, Exempt Equipment, is intended to satisfy the Title V requirement that insignificant activities be identified at the source. Insignificant activities include equipment clearly exempted from permit by the District's permit exemption rule. For equipment that is exempted from permit by rule, this equipment should be listed by: type of equipment, equipment description and the permit exemption rule should be cited for "BASIS FOR EXEMPTION". The equipment description should provide enough information to demonstrate compliance with the permit exemption rule. For example, for I.C. engines used at a facility which are not under permit, the number of such engines and the range in horsepower of the engines should be provided.

There are other types of activities that occur at facilities that are typically not regulated by the District and are considered trivial. Examples of activities considered trivial are listed in Attachment C and can be omitted from the application.

- C Short-term activities, which occur infrequently and for a short duration at the source, can be considered a generic requirement. The application should document the applicability of any applicable federal requirements to short-term activities at the facility and describe the facility's compliance status with respect to these requirements.

Short-term activities that are not subject to an applicable federal requirement can be treated as an insignificant or trivial activity and, therefore, the application need not address this activity.

### **Compliance Plan Forms (Forms XXX-I1 & I2):**

- C Applicant shall indicate in form XXX-I1 the facility's compliance status, at the time of filing this application, with each existing applicable federal requirement, or the effective date for future applicable federal requirements.
- C For each applicable federal requirement, indicate the compliance status with each emission limit, operational limit and work practice requirement. If these operational limits and work practice requirements are contained in an existing permit, the applicant can either cross-reference information from the permits, reference the conditions by number and permit, or enter the information directly into these application forms. These permits should be attached to the application. However, all emission limits should be identified in the form.
- C A "generic" applicable federal requirement that applies to all sources at a facility (e.g., a SIP-approved opacity rule) can be addressed in the application by indicating that there is a facility-wide requirement and describing the compliance status of the facility. However, where the provisions of an applicable federal requirement applies to a particular source or piece of equipment at the facility, that source's compliance status must be individually addressed (e.g., the opacity requirements of a New Source Performance Standard (NSPS)).
- C Applicant shall attempt to identify, to the best of their knowledge, the applicable State Implementation Plan (SIP) requirements which affects the source.
- C For each applicable federal requirement for which the facility does not comply with at the time of application submittal, at a minimum, the applicant must attach a discussion of the circumstances for the noncompliance and how the source will achieve compliance.
- C The applicant must attach a **compliance schedule** for each applicable federal requirement the source will not comply with at the time of permit issuance. If the facility is operating under a variance and the variance is in effect for more than 90 days, the compliance schedule is the schedule contained in the variance issued by the hearing board. No schedule is required if the variance is in effect for less than 90 days. Whether a compliance schedule is required or not required, the applicant is still required to submit a discussion regarding circumstances for noncompliance.
- C In form XXX-I2, the Responsible Official must certify to the correctness of the information provided in the form XXX-I1.

### **Compliance Plan Certification Forms (Forms XXX-J1 & J2):**

- C In form XXX-J1, the applicant shall specify dates for submittal of the compliance certification report and the certified progress report. The District is not compelled to use this schedule and can specify a different schedule.
- C Certification Information The applicant shall indicate in this form the monitoring, test methods, recordkeeping, and reporting required to demonstrate compliance with the applicable federal requirement. Requirements include emission limits, operational limits and work practice

requirements. Where these methods are not specified in the applicable federal requirement, the applicant shall indicate the methods that will be used by the operator to demonstrate compliance.

#### **Certification Statement Form (Form XXX-M)**

- C Place a check mark next to the forms and attachments included with the application.
- C The Responsible Official must certify to the truth, accuracy and completeness of the application submittal.
- C The applicant should review the definition of Responsible Official, as defined in Attachment B to determine if the proper individual is certifying the truth, accuracy and completeness of this application.

#### **ATTACHMENTS:**

The following should be included as attachments with the application:

- ! Description of all the alternative operating scenarios that the source may operate under. Identify the main operating scenarios and all other operating modes proposed as alternative operating scenarios. Alternative operating scenarios include: use of alternative fuels, solvents, coatings, or a change in process. Alternative operating scenario need not be proposed for each specific operating mode--only if the operating mode will be subject to additional applicable federal requirements. Sufficient information shall be included to ensure that each alternative operating scenario identified complies with all applicable District, state, and federal requirements. Additional permit terms and compliance certifications should be identified in the Compliance Plan and Compliance Plan Certification forms.
- ! Emission calculations
  - Provide calculations or description of methodology used for all emission estimates included in this application.
  - Fugitive emissions from the stationary source and corresponding calculations should be provided separately.
- ! Provide the basis for applicability of each applicable federal requirement that applies to the affected source. In a separate table, list all applicable federal requirements, affected unit(s) and basis for applicability.
- ! For sources that are out of compliance with an applicable federal requirement, an attachment that discusses the circumstances for the noncompliance for each requirement the source will be out of compliance with at the time of application submittal, how the source will achieve compliance with requirements the source is violating, , and if necessary a Schedule of Compliance.
- ! For sources that choose to provide a cross-reference for equipment descriptions in permits, a summary listing the PTOs and indicating the major equipment described in the permit.
- ! The facility's current permits, including any permits issued through the New Source Review (NSR)

or Prevention of Significant Deterioration (PSD) programs. These are required to be attached if the applicant chooses to cross-reference information in these permits and also to document what the applicable federal requirements are from these permits.

- ! An engineering schematic(s) which identifies all emission unit(s) and points of emissions.

**CERTIFICATION AND DEVIATION REPORT FORMS (Forms K1 ,K2 & L):**

- ! Forms XXX-K1, XXX-K2 and XXX-L should not be submitted with the application. These forms are to be used for preparing the Compliance Certifications, Compliance Schedule Progress, Monitoring, and Deviation reports required of Title V sources. After the issuance of a Title V permit, a Responsible Official shall submit reports to the District in accordance with the reporting requirements specified in the permit.